

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

OCT 22 2009

REPLY TO THE ATTENTION OF:

E-19J

Norman Stoner, P.E.
Illinois Division Administrator
Federal Highway Administration
3250 Executive Park Drive
Springfield, Illinois 62703

Re: Tier 1 Draft Environmental Impact Statement for the Elgin-O'Hare West Bypass,
Cook and DuPage Counties, Illinois CEQ#20090314

Dear Mr. Stoner:

The U.S. Environmental Protection Agency (USEPA) has reviewed the Tier 1 Draft Environmental Impact Statement (DEIS) for the Elgin-O'Hare West Bypass project, prepared by the Federal Highway Administration (FHWA) and the Illinois Department of Transportation (IDOT). Our comments are provided for your consideration pursuant to our authorities under the National Environmental Policy Act (NEPA), the Council on Environmental Quality regulations, and Section 309 of the Clean Air Act.

The project study area encompasses 127 square miles in Cook and DuPage Counties, second only to downtown Chicago as a concentration of jobs and daily travel trips in the Chicago metropolitan area. This project is a tiered study. Tier 1 evaluates multi-modal options, leading to selection of a preferred transportation concept. A future Tier 2 will consist of detailed analysis of discreet project elements. The project is intended to meet four key objectives, as outlined in the Purpose and Need statement:

- Improve regional and local travel by reducing congestion;
- Improve travel efficiency;
- Improve access to O'Hare International Airport from the west;
- Improve modal opportunities and connections.

We commend the FHWA/IDOT project team for its skill in working extensively with a large group of diverse stakeholders and the public to consider and distill numerous multi-modal transportation ideas in this complex geographic area into a manageable set of alternatives. These alternatives were then evaluated in detail as part of the Tier 1 DEIS. The "No Build" baseline alternative includes roadway and transit improvements that are expected to be built in the study area by 2030, notably 80 additional lane-miles of

roads, 135 miles of roadway rehabilitation and improvements, 54 interchange/intersection improvements, and bus/rail transit improvements.

The Tier 1 DEIS presents two build alternatives for the study area: Alternative 203 and Alternative 402. Both would upgrade and extend the existing Elgin-O'Hare Expressway east from its current terminus at Rohlwing Road to the planned western entrance to O'Hare Airport. Alternative 203 provides a complete freeway western bypass of O'Hare Airport between Interstate 90 and Interstate 294. The South Bypass connection has two options. Option A follows County Line Road from the south edge of the railroad marshalling yard to I-294. Option D parallels the east side of the Union Pacific Railroad from the railroad marshalling yard to I-294. Alternative 402 is identical to Alternative 203, except for the portion of the airport bypass north of Thorndale Avenue. That north section of bypass is proposed as an arterial road upgrade of York Road and Elmhurst Road. A variety of screened transit improvements and expansions and arterial network improvements are contemplated and carried forward with both Alternatives 203 and 402. Both alternatives also include strategies for transportation system management, travel demand management, and system upgrades for bicycle and pedestrian movements. No preferred alternative is designated in the Tier 1 DEIS.

This project has been undertaken as a merger of the NEPA process and the Clean Water Act Section 404 wetlands permitting process. USEPA continues to be an active participant in that process, along with the transportation agencies and other natural resource agencies. Under the NEPA/404 merger process, we had previously concurred on the project Purpose and Need (as revised) and the Range of Alternatives for Detailed Study. We look forward to participating in the concurrence process that will select a preferred alternative prior to the publication of the Tier 1 Final EIS.

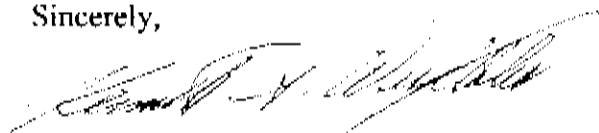
The two surviving build alternatives have similar projected wetland impacts. We do not foresee significant problems with either alternative being permitted under Section 404. The Tier 1 DEIS does not offer details on wetland mitigation. We request that conceptual mitigation measures be proposed in the Tier 1 Final EIS for wetland losses that can not be avoided or minimized. We recognize that many of the detailed environmental analyses and detailed mitigation measures will not be undertaken or developed until Tier 2. At that time, a detailed wetland delineation and functional assessment should be undertaken, and specific commitments on the ratios, types, and proposed locations of wetland mitigation should be provided. Tier 2 should discuss measures that will be implemented to capture and treat stormwater, to minimize any adverse impacts to receiving streams from road salt and other road run-off constituents.

The Tier 2 studies should also evaluate air quality impacts, positive and negative, from the various components of the project, including hot spot analysis for carbon monoxide and particulates of 2.5 microns or less (PM_{2.5}). IDOT has embraced clean diesel and anti-idling strategies for other major road projects in recent years. We expect that the Tier 2 EIS will spell out those measures and other commitments to minimize air pollution in the study area as these projects are implemented.

We have assigned a rating of "Lack of Objections" to this Tier 1 DEIS, and to both of the remaining Tier 1 build alternatives. A summary of our rating system for EISs is enclosed.

Thank you for the opportunity to review and comment on this project. We look forward to our continued involvement and cooperation with FHWA and IDOT during the balance of the Tier 1 process and throughout Tier 2. If you or your staff have any questions concerning our comments, please contact me at 312-886-2910 or westlake.kenneth@epa.gov, or Sherry Kamke of my staff at 312-353-5794 or kamke.sherry@epa.gov.

Sincerely,



Kenneth A. Westlake
Chief, NEPA Implementation Section
Office of Enforcement and Compliance Assurance

Enclosure

cc: Diane O'Keefe
Deputy Director, Region 1 Engineer
Illinois Department of Transportation
201 West Center Court
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